

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNIVERSITAS EDUCATION, LLC,	:	
	:	
Judgment Creditor,	:	
	:	
-against-	:	Nos. 11 CV 1590-LTS-HBP and
	:	11-8726-LTS
NOVA GROUP, INC., as trustee, sponsor and	:	
fiduciary of THE CHARTER OAK TRUST	:	
WELFARE BENEFIT PLAN,	:	
	:	
Judgment Debtor,	:	
	:	
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**DECLARATION OF MICHAEL BARNETT IN SUPPORT OF UNIVERSITAS'S
MOTION SEEKING TO REGISTER ITS JUDGMENT IN OTHER JURISDICTIONS**

MICHAEL BARNETT, an attorney admitted to practice law in this Court, declares the following under penalty of perjury pursuant to 28 U.S.C. §1746:

1. I am an associate at Loeb & Loeb LLP, attorneys for Universitas Education, LLC (“Universitas”), the Petitioner/Judgment Creditor in the above-captioned proceeding.
2. On September 18, 2014, by email, I provided an advanced draft of the memorandum of law supporting the instant motion to respective counsel for each of the Judgment Debtors. I reminded counsel of this Court’s requirement that parties confer prior to the making of a motion, and asked that opposing counsel comment on the motion by September 23. By the evening of September 23, and as of this writing, I have not received any comments on the instant motion, and assume that all Judgment Debtors oppose it.
3. As of this writing, we have not been able to locate any asset of the Judgment Debtors within the State of New York, though our investigation continues.

4. Attached as **Exhibit 1** is a true and accurate copy of excerpts of the February 6, 2013 deposition of Donald J. Trudeau, with highlights for ease of reference.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and complete.

Dated: New York, New York
September 25, 2014

/s/ Michael Barnett.
MICHAEL BARNETT